

Patrick H. Merrick, Esq.
Director – Regulatory Affairs
AT&T Federal Government Affairs

Suite 1000 1120 20th Street NW Washington DC 20036 202 457 3815 FAX 202 457 3110

May 23, 2002

## Via Electronic Filing

Ms. Marlene Dortch, Secretary Federal Communications Commission 445 Twelfth Street, S.W., Room TW-B204 Washington, DC 20554

Re: *Notice of Ex Parte Presentation*: Numbering Resource Optimization, CC Docket No. 99-200.

Dear Ms. Dortch:

Yesterday, Robert Quinn Jr. and I met with Jordan Goldstein, Legal Advisor to Commissioner Michael J. Copps to discuss AT&T's Petition for Reconsideration of the Commission's *Third NRO Order*<sup>1</sup>. AT&T emphasized that the size of the exogenous cost changes for Thousand Block Number Pooling ("TBNP") currently being sought by certain carriers significantly exceed the original expectations set by much of the language contained in the *Third NRO Order*. We also discussed the apparent inconsistencies between the *First NRO Order*<sup>2</sup>, which indicated that cost recovery should be similar to that used in the local number portability proceedings and the *Third NRO Order*, which expresses the opposite view that numbering administration is inherently access-related and should be recovered as such<sup>3</sup>. AT&T urged the Commission to take immediate action consistent with its petition in the above mentioned proceedings.

Consistent with the Commission rules, I am filing one electronic copy of this notice and request that you place it in the record of the proceedings.

Sincerely,

cc: Jordan Goldstein

<sup>1</sup> In the Matter of Numbering Resource Optimization, 17, FCC Rcd 4784 (2002) ("Third NRO Order")

<sup>&</sup>lt;sup>2</sup> Numbering Resource Optimization, 15 FCC Rcd 7574, Para. 193 (2000)("First NRO Order")

<sup>&</sup>lt;sup>3</sup> Third NRO Order, Supra, Para. 34.